

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

IN THE MATTER OF:

Silverside Senior Living, LLC, *et al.*¹

Debtors.

Bankruptcy Case No. 21-44887
Honorable Lisa S. Gretchko
Chapter 11

**STIPULATION FOR ENTRY OF ORDER GRANTING LIMITED RELIEF
FROM THE AUTOMATIC STAY**

NOW COMES Alice Handlang, as Personal Representative of the Estate of Loren Pensinger, (the “Personal Representative”), and Silverside Senior Living, LLC and Graceway South Haven, LLC (collectively, the “Debtors”), each by and through their undersigned counsel, who do hereby stipulate the entry of the attached Exhibit A, Order Granting Limited Relief from the Automatic Stay, and as follows:

1. The filing of Plaintiff’s Complaint on June 25, 2021, in the matter of *Alice Handlang, as PR of the Estate of Loren Pensinger v. Graceway South Haven, LLC* (Case No. 21-71139-NH) (the “Complaint”), against the Debtor in the Van Buren County Circuit Court shall not be deemed a violation of the automatic state under 11 U.S.C. § 362; and

¹ The Debtors in these jointly administered proceedings along with the last four digits of their respective federal tax id numbers are: Silverside Senior Living, LLC (2357) [Case No: 21-44887-lsg] and Graceway South Haven, LLC (9393) [Case No: 21- 44888-lsg].

2. The Defendant shall have forty-five (45) days from the entry of the attached Order Granting Limited Relief from the Automatic Stay to file its answer or otherwise respond to the Complaint in the Van Buren County Circuit Court.

Approved as to form and content:

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UNITED STATES TRUSTEE

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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

IN THE MATTER OF:

Silverside Senior Living, LLC, *et al.*¹

Debtors.

Bankruptcy Case No. 21-44887
Honorable Lisa S. Gretchko
Chapter 11

ORDER GRANTING LIMITED RELIEF FROM THE AUTOMATIC STAY

THIS MATTER having come before the Court upon the stipulation of the parties, and the Court finding good cause to grant the relief requested herein;

IT IS HEREBY ORDERED that Alice Handlang, as Personal Representative of the Estate of Loren Pensinger, (the “Personal Representative”) is granted and the automatic stay in these proceedings is lifted for the following limited purposes:

A. Allowing the Personal Representative to continue prosecution of the Van Buren County Circuit Court action, *Alice Handlang, as Personal Representative of the Estate of Loren Pensinger, v. Graceway South Haven, LLC*, Case No. 21-71139-NH, for the purpose of liquidating the Personal Representative’s claim

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against Graceway South Haven, LLC and any non-Debtor parties, filing a claim in a liquidated amount, for the right to receive distribution from any assets available for distribution in these Chapter 11 Proceedings; and

B. Allowing the Personal Representative to attempt collection from any sources of recovery other than the bankruptcy estate or its assets, which may be liable on such obligations, including, but not limited to any applicable insurance coverage.